

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

C.A. NO. 04-CV-10521-GAO

BETTY ANNE WATERS, as Administratrix of the
Estate of KENNETH WATERS,

Plaintiff

v.

TOWN OF AYER, NANCY TAYLOR-HARRIS,
in Her Individual Capacity, ARTHUR BOISSEAU,
In His Individual Capacity, BUDDY DECOT, In
His Individual Capacity, WILLIAM ADAMSON,
in His Individual Capacity, PHILIP L. CONNORS,
in His Individual Capacity, and JOHN DOE and
JANE DOES 1-16, in Their Individual Capacities,

Defendants

JOINT MOTION FOR PROTECTIVE
ORDER

Now come the parties to the above-captioned action and hereby respectfully move for the Court's entry and execution of the enclosed Protective Order, to whose terms the parties have stipulated via the execution of same by their respective counsel.

As grounds therefor, the parties state that the proposed Order shall facilitate exchange of materials during discovery while maintaining the parties' legitimate privacy interests.

FOR THE PLAINTIFF:

FOR THE DEFENDANTS:

/s/ Deborah L. Cornwall (by Jeffrey Blake) /s/ Joseph L. Tehan, Jr.

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